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United States Department of Energy / Savannah River Site

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Aiken, Allendale, and Barnwell Counties

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MODULE V - CONTAINERS

SECTION C

TRANSURANIC WASTE PAD 3-6, 14-19, & 26 FACILITY

MODULE V

SECTION C

TRANSURANIC WASTE PADS 3-6, 14-19, & 26 FACILITY

Module VC.

VC.A. MODULE HIGHLIGHTS

The TRU Pads 3-6, 14-19, and 26 Facility (**TRU Pads Facility**) is located in E-Area and consists of eleven concrete pads. Grounded, steel frame, weather protection enclosures cover each pad. The pads are designed with liquid collection systems and in such a manner as to prevent run-on and run-off. The facility is used to store, process, and treat mixed, hazardous and radioactive TRU (transuranic) waste generated at SRS and within the DOE complex for disposal at the Waste Isolation Pilot Plant (WIPP) in Carlsbad, New Mexico or other regulated facilities.

TRU Pad 16 was closed by an interim measure in 2015 as documented in the Notification of Completion of the Transuranic Waste Pad 16 Interim Measures Closure Certification Report and Drawing C-CC-E-0071 Rev. 3 , dated October 21, 2015.

A complete description of the container storage area(s) can be found in Volume XIII of the approved 2013 RCRA Permit Renewal Application (Permit Application).

VC.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

VC.B.1. Permitted Waste

The Permittee may store, process, and/or treat the following hazardous wastes in containers at the facility, subject to the terms of this Permit and as follows:

Container Storage Area(s)	EPA Hazardous Waste Number	Maximum Volume (gallons)	Maximum Number and Type of Containers	Maximum Treatment Volume (cubic feet per day)
Pads 3-6, 14,15, 17-19 and 26	See Table C-3 of Volume XIII of the approved Permit Application --	Facility Total = 905,430	See Table D-1 and Section D.1.2.2 of Volume XIII of the approved Permit Application --	Absorption of Liquid 500 pH Adjustment 200 Filtering 500 Deactivation 500 Stabilization 500 <u>Debris Treatment 200</u> Facility Total 2400 * (* gallons/day 17,950)

VC.B.2. Prohibited Waste

VC.B.2.a. The Permittee is prohibited from storing and/or treating hazardous waste that is not identified in Permit Condition VC.B.1

VC.C. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this Permit and the requirements of R.61-79.264 Subpart I. [R.61-79.264.171]

VC.D. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee must use a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired. [R.61-79.264.172]

VC.E. MANAGEMENT OF CONTAINERS

VC.E.1. The Permittee shall keep all containers closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner that may rupture the container or cause it to leak. [R.61-79.264.173]

VC.E.2. The permittee shall not store waste on the asphalt apron areas around Pads 4 and 6 unless the following criteria, as listed in Volume XIII, Section D, are met: 1) storage is limited to seven (7) consecutive days per individual container being stored, 2) containers must be inspected twice during that period, and 3) containers must be maintained on secondary containment pallets (spill pallets) or secondary containment dikes.

VC.F. CONTAINMENT SYSTEMS

VC.F.1. The Permittee shall maintain the containment system in accordance with R.61-79.264.175 and Volume XIII of the approved Permit Application.

VC.F.2. The Permittee may store waste containing free liquids on **Pad 26 within the limits of available containment capacity of 102,757.8 gal and as described in Volume XIII, Table D-1 of the approved Permit Application. The Permittee may store waste containing free liquids on each of Pads 3-6, 14,15, and 17-19 per Permit Condition VC.M.1.**

VC.G. INSPECTION SCHEDULES AND PROCEDURES

VC.G.1. The Permittee shall inspect the container area weekly (generally every seven days, not to exceed any nine day calendar interval), in accordance with the Inspection Schedule,

included in Volume XIII, Section F of the approved Permit Application, to detect leaking containers and deterioration of containers and the containment system caused by corrosion and other factors. [R.61-79.264.174]

VC.G.2. The Permittee shall inspect the **TRU Pads Facility** in accordance with the Inspection Schedule included in Volume XIII, Section F of the approved Permit Application.

VC.H. RECORDKEEPING

The Permittee shall place the results of all waste analyses and trial tests and any other documentation showing compliance with the requirements of Permit Conditions VC.J. and VC.K. and R.61-79.264.17(a) & (b) and 264.177 in the facility operating record. [R.61-79.264.73]

VC.I. CLOSURE

At closure of the container area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system and surrounding areas, in accordance with the procedures in the approved Closure Plan contained in Volume XIII, Section I of the approved Permit Application and R.61-79.264.112 and 264.178.

VC.J. SPECIAL CONTAINER PROVISIONS FOR IGNITABLE OR REACTIVE WASTE

VC.J.1 Ignitability or Reactive Waste Setback

The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line. [R.61-79.264.176]

VC.J.2 Ignitability or Reactive Waste Precautions

The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures specified in Sections D.1.2 and F.5 of the approved Permit Application. [R.61-79.264.17(a) and 264.176].

VC.K. SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE

VC.K.1. Placement in Same Container

The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same container unless R.61-79.264.17(b) is complied with and the procedures specified in Volume XIII of the approved Permit Application are followed. [R.61-79.264.177(a)]

VC.K.2. Placement in Unwashed Container

The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material. [R.61-79.264.177(b)]

VC.K.3. Separation of Containers

The Permittee shall separate containers of incompatible wastes as required by R.61-79.264.177(c) and described in Volume XIII of the approved Permit Application.

VC.L. COMPLIANCE SCHEDULE

Specific compliance dates for this module are included in Appendix D - Additional Compliance Dates.

VC.M. SPECIAL CONDITIONS

- VC.M.1. Pads 3-6, 14,15, and 17-19 store wastes that contain limited amounts of free liquids but do not have an impervious base. A containment system that holds ten percent (10%) of the waste or the volume of the largest container must be provided. Drum pallets or spill containment dikes shall be used to meet this requirement for these pads. Pad 26 has secondary containment to hold 10 percent of the volume waste stored on the Pad. Table D-1 provides the maximum number of 55-gallon drum equivalents that may be stored at the TRU Pads 3-6,14-19 and 26 facility.**
- VC.M.2. Additional processing equipment for processes listed in the permit may be located within and adjacent to TRU Pads 3-6,14, 15, 17-19 and 26 subject to the following requirement and as described in Volume XIII, Section B.1 and Section D of the approved Permit Application. SC DHEC must be notified within thirty (30) days of the placement of the additional processing equipment. The notification must include information as described in Volume XIII, Section D of the approved Permit Application.**
- VC.M.3. The following conditions apply to TRUPACT II Payloads.**
- VC.M.3.a. No more than 21 payloads may be stored at any one time**
- VC.M.3.b. Payloads may be stored only on TRU Pad 3.**
- VC.M.3.c. Storage is limited to a maximum of four months for any one payload. Each payload must be clearly labeled to show the date when it was configured.**
- VC.M.3.d. Payloads may be staged only one payload high (SRS will need to submit seismic analysis prior to approval to stack two high in racks.)**
- VC.M.4. Air Emission Standards**
- VC.M.4.a The Permittee shall meet the applicable air emission standards as described in Volume XIII, Section F.6. of the approved Permit Application.**
- VC.M.4.b The Permittee shall meet the applicable air emission standards for Subpart CC found in Module XIII of this Permit.**

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